

MICHAEL H. SCHWARTZ, P.C.
ATTORNEYS AT LAW

ONE WATER STREET
WHITE PLAINS, NEW YORK 10601

www.NYLegalHelp.com

TELEPHONE: 914 997-0071
FAX: 914 997-0536

EMAIL: michael@NYLegalHelp.com

August 28, 2015

Robert D. Drain, USBJ
United States Bankruptcy Court
300 Quarropas Street
White Plains, NY 10603

STATUS REPORT ECF ONLY

Re: In re Debra Marin
Case No: 12-23649
Hearing Date: 9/18/2015
Our File No: 36676


Dear Judge Drain:

On July 27, 2015 the Court issued its Revised Scheduling Order (ECF Doc 71). A Notice to Produce was timely served and timely complied with. All issues in the Objections to the Notice were timely resolved between counsel without the need for Court intervention.

The Deposition of the Creditor was held on August 6, 2015 during which it was agreed that the creditor would file an Amended Proof of Claim which would better delineate the claim and obviate the need for prolonging the deposition.

Although no deadline was or could be set to file the amended proof of claim, as it has not been filed as of today, it seems unlikely that the hearing can be held on September 18, 2015.

I am requesting either a Status Conference or a New Scheduling Order setting forth a deadline to file the amended Proof of Claim, filing the anticipated objection to same and hearing on the objection.


08/28/2015 09:51:58 am

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Michael H. Schwartz

MHS/me